

Rumrill, Nancy

From: Dan Johnson <DanJohnson@florencecopper.com>
Sent: Wednesday, March 7, 2018 12:13 PM
To: Rumrill, Nancy
Subject: RE: FA Guidance

Hi Nancy,

Thank you for following up on this question. I'm in the process of getting all of the necessary information to the bond company.

Cheers,

Dan Johnson VP | General Manager



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From: Rumrill, Nancy [<mailto:Rumrill.Nancy@epa.gov>]
Sent: March-07-18 11:20 AM
To: Dan Johnson
Subject: FA Guidance

Hi Dan,

There is some Financial Assurance guidance at <https://www.epa.gov/uic/guidance-documents-underground-injection-control-financial-responsibilities> although not directly applicable to Class III wells. The guidance for Class II oil and gas related wells have some of the same references to the financial responsibility requirements as your permit from Subpart F, 40 CFR §144.63 at https://www.epa.gov/sites/production/files/2016-11/documents/revised_epa_class_ii_fr_guidance_november_2016.pdf. As I said in my voice mail to you, please refer to 40 CFR §144.70 for required wording of the financial instrument.
Thanks, Nancy

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